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**EX PARTE**

May 11, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: IP-Enabled Services, WT Docket 04-36**

Dear Ms. Dortch:

On May 10, 2005, Ron Sladon and Lon Johnson of Multi-Link, Incorporated, and Glenn Richards and Jarrett Taubman of Pillsbury Winthrop Shaw Pittman LLP, outside counsel to Multi-Link, Incorporated (collectively, "Multi-Link"), met with: Tim Stelzig, Nick Alexander, and Julie Veach of the Wireline Competition Bureau; Michelle Carey, Legal Advisor to Chairman Martin; Jessica Rosenworcel, Legal Advisor to Commissioner Copps; Lauren "Pete" Belvin, Legal Advisor to Commissioner Abernathy; and Scott Bergmann, Legal Advisor to Commissioner Adelstein.

During the meetings, Multi-Link discussed its TeleVoIP Stick, which seamlessly integrates VoIP service with the existing Public Switched Telephone Network ("PSTN"). Multi-Link focused on the TeleVoIP Stick's ability to automatically route all 9-1-1 calls through the PSTN line, eliminating concern that users of any underlying VoIP service would be unable to obtain emergency service. Multi-Link requested that the Commission specify that where VoIP service is provided using equipment designed to automatically route all 9-1-1 calls through an existing PSTN connection – such as the TeleVoIP Stick – the use of such equipment would satisfy any 9-1-1 or E-9-1-1 requirement that may be imposed on fixed users of VoIP services. Copies of the supporting materials distributed at the meetings are appended to this letter.

Please contact the undersigned should you have any questions in this matter.

Ms. Marlene H. Dortch  
May 11, 2005  
Page 2

Sincerely,

\_\_\_\_\_  
/s/

Glenn S. Richards  
*Counsel for Multi-Link, Incorporated*

cc: Tim Stelzig, Wireline Competition Bureau  
Nick Alexander, Wireline Competition Bureau  
Julie Veach, Wireline Competition Bureau  
Michelle Carey, Office of Chairman Martin  
Jessica Rosenworcel, Office of Commissioner Copps  
Lauren "Pete" Belvin, Office of Commissioner Abernathy  
Scott Bergmann, Office of Commissioner Adelstein.

42118-0001

## MULTI-LINK, INC: CORPORATE CAPABILITIES

**Multi-Link, Inc.** is a Kentucky based manufacturer dedicated to the development and marketing of high quality telecommunications devices for a wide variety of commercial and government applications. During our 16 years of operation, we have earned a reputation as a manufacturing leader and supplier of cost-saving telecom solutions. Hundreds of companies, from SOHO to Fortune 500, domestic and international, have installed thousands of our devices to reduce their monthly phone bills and associated costs.

Multi-Link has established brand name recognition among system integrators, telephone interconnects, and other telephony professionals. Our product quality and technical support is unsurpassed. We have consistently maintained a policy for channel harmony that is fair and equitable. Our dominant market share is attributable to universal product benefits, sound business fundamentals, and innovative product designs that keep pace with emerging technologies in a dynamic marketplace.

**Products:** Multi-Link, Inc. manufactures: 1) Telephone Line-Sharing Devices that reduce monthly telecom expenses through more efficient use of existing phone lines: *The Stick, The Stick II, The LineHunter, The SR Series, and The Versa-Link*. 2) Remote Power Reboot Devices activated by telephone, internet, and heartbeat that reduce service calls: *The Power Stone, Internet Power Stone (IPS), Auto Push Button, Remote Relay Box*.

**Basic Product Features:** Minimum 1 year warranty, Barge-in protection, Programmable security access codes, Non-volatile memory, DTMF programming, Surge protection, Telco compatibility, Factory direct support, Bell spec ringback.

**Special Services:** Unlimited, toll-free technical support. Remote programming and diagnostics. Experienced project planning for field implementation, factory programming to application specs, and quick installation guides. OEM and custom engineering available.

**Industries Served:** Oil Well Services and Equipment, Retail (All Sectors), Energy Management, Security, Computer Network and Services, Hotels/Motels, Banking, Utilities (Electric, Gas, Water), Traffic Control, Communications Equipment & Services, Waste Management, Schools, Restaurants, Healthcare Facilities, Office Equipment

**Awards and Certifications:** AT&T Silver Centurion Quality Award; CES Design and Engineering Innovations Award – **The Stick II** ; Commonwealth of Kentucky Quality Award ; Small Business of the Year; Teleconnect Editor's Choice Award – **The Power Stone**; Governor's New Product Award -- **The Power Stone**; CES Designs and Innovations Award – **The Stick and The Power Stone**

**Intangibles:** Industry Leader since 1987; Not Sold in Mass-Merchandisers; Low Return Rate (.01% out of box failures!); Truest Bell Spec "Ring-back" in Industry; Unlimited Toll-Free Tech Support Direct from Factory; Custom Engineering

Multi-Link, Inc. ~ 225 Industry Parkway ~ Nicholasville, KY 40356 ~ 800.535.4651



For Immediate Release  
April 27<sup>th</sup>, 2005

Contact:  
Scott Shelton 800-535-4651  
sshelton@multi-link.net

**Multi-Link Introduces The TeleVoIP Stick™**

*Overcomes VoIP Residential Market Barriers and Provides E911 Access*

**Nicholasville, KY – April 27<sup>th</sup>, 2005** – In response to the barriers facing VoIP adoption by consumers and recent comments from FCC Chairman Kevin Martin concerning 911 access, Multi-Link, Incorporated today announced that it is providing its patent pending “TeleVoIP Stick™” to all VoIP providers for testing immediately.

As a rapidly growing communication option, VoIP must overcome several perceived barriers in order to gain broader national consumer acceptance. In response to those barriers, Multi-Link, Inc. designed the TeleVoIP Stick, which is a transparent communication system that allows for VoIP compatibility with the existing Public Switched Telephone Network (PSTN).

“There are three major barriers to VoIP adoption by the consumer: resistance to change, loss of service, and E911 incompatibility,” said Ron Sladon, President of Multi-Link. “The TeleVoIP Stick overcomes each of these barriers and empowers the user with new levels of convenience, choice and control in everyday communications.”

The TeleVoIP Stick was unveiled recently at the CES Innovations Plus show on January 6<sup>th</sup>, 2005. “The TeleVoIP Stick was designed to enable the transparent blending of the everyday phone experience with an Internet voice application,” stated Sladon.

The TeleVoIP Stick enables all home phones to operate as traditional analog phones or VoIP phones transparently. During power failures or broadband service disruptions, the TeleVoIP Stick automatically directs all outbound calls to the PSTN line, allowing for seamless communication service.

One of the most critical features of The TeleVoIP Stick is its ability to automatically route E911 calls through the traditional PSTN line. This unique Patent Pending feature eliminates the concern for E911 calls made by VoIP consumers.

Unlike other telecom technology advances that require the user to purchase new phone equipment, The TeleVoIP Stick allows the user to keep and use their existing standard home phone equipment and, more importantly, their calling habits remain the same. “The TeleVoIP Stick was designed with enough power to drive six or more solid state telephones,” stated George Hart, Multi-Link’s Director of Technical Services.

Multi-Link Incorporated is a fully integrated, Kentucky based manufacturing operation dedicated to the development and marketing of high quality telecommunications and telephony devices for a variety of commercial, small office, and home applications. With over 16 years of experience, the company has earned a reputation as a manufacturing leader. Hundreds of companies, from SOHO to Fortune 500, have reduced their monthly phone bills and associated costs by using Multi-Link products.

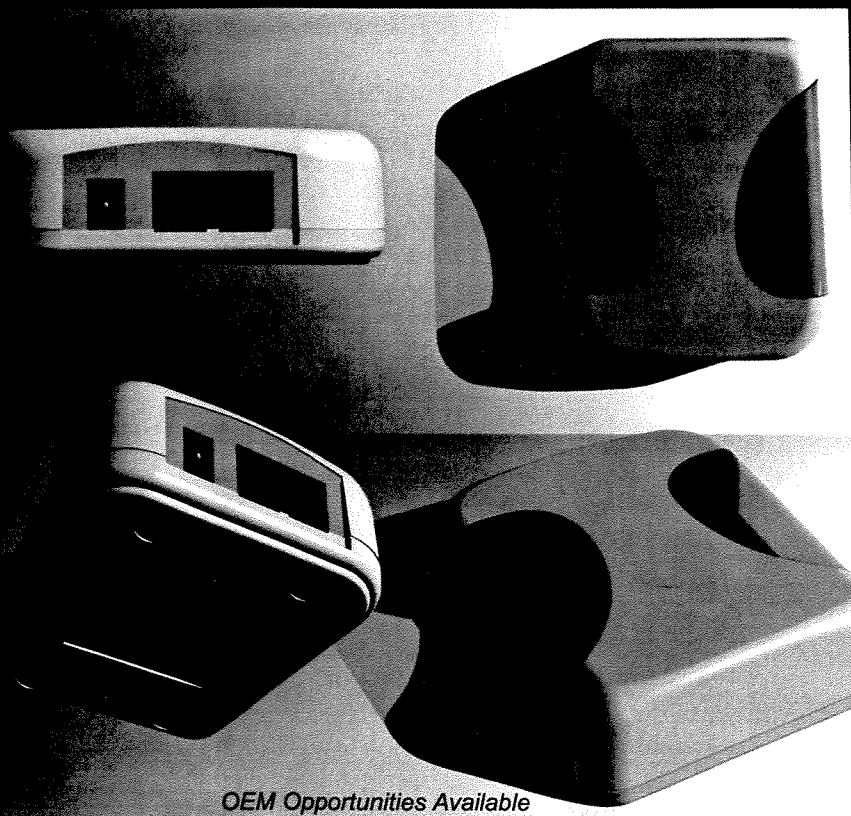
225 Industry Parkway ~ Nicholasville, KY 40356 ~ [www.multi-link.net](http://www.multi-link.net)

Main: 800.535.4651 ~ Fax: 859.885.6619

# THE TELEVOIP STICK™

## Bring VoIP Home!!

The TeleVoIP Stick™ is a revolutionary residential VoIP system that breaks down the barriers to widespread home implementation. It is designed and engineered to enable the transparent blending of the everyday phone experience with an Internet voice application. The TeleVoIP Stick empowers the user with new levels of convenience, choice, and control in everyday communications. The TeleVoIP Stick enables ALL home phones to operate as traditional analog phones or as VoIP phones...transparently!



OEM Opportunities Available

## Features and Benefits:

### USE ANY PHONE

- \* Bring transparent VoIP access to all your standard home (analog) phones.
- \* No need to buy extra VoIP phones, microphones, speakers, or adaptors.
- \* Calling habits remain the same!

### E911 SOLUTION

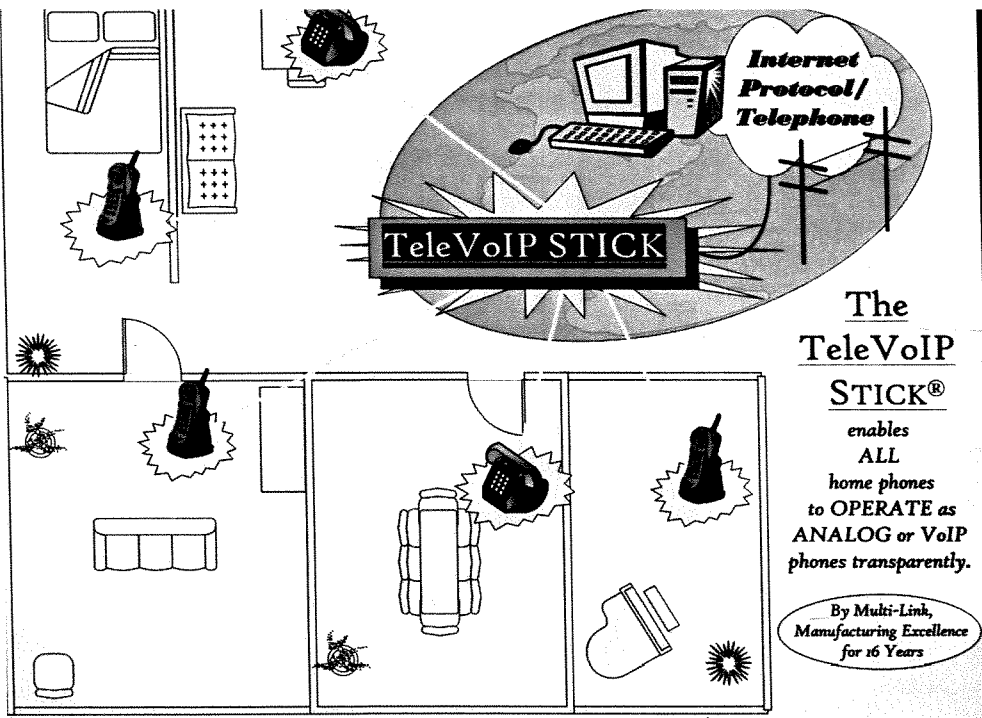
- \* The TeleVoIP Stick will automatically route 911 calls to your traditional phone (POTS) service!
- \* Power outages to your PC or network downtime will not hamper emergency phone calls.
- \* No need for a UPS for back-up power.

### AVAILABLE FEATURES

- \* Call waiting
- \* Three way calling
- \* Answering machine
- \* Call forwarding
- \* IM notification
- \* Auto-attendant
- \* Conversation recording
- \* Remote audio monitoring
- \* Virtual second line

---

Multi-Link, Inc  
225 Industry Parkway  
Nicholasville, KY 40356  
800-535-4651  
[www.TELEVOIPSTICK.com](http://www.TELEVOIPSTICK.com)



**Internet Protocol / Telephone**

**TeleVoIP STICK**

**The TeleVoIP STICK®**  
enables ALL home phones to OPERATE as ANALOG or VoIP phones transparently.

By Multi-Link,  
Manufacturing Excellence  
for 16 Years

## Specifications:

- \* Supports multiple protocols- H.323 signaling std or SIP
- \* Converts digital to analog
- \* REN 5.0 @ 49.5V RMS AC
- \* Patent Pending
- \* One year warranty

Powered by



# eye P Media

## Award Winning Product Line:

The Stick - 1x4 phone line sharing device  
ACP Series - Industrial grade line sharing device in 3, 5, and 9 port configurations  
Stick II - 2x5 auto call processor  
The LineHunter - 4x12 call processor  
SR Series - Selective ring call processor  
The Power Stone - Call activated AC power reboot device; Manual and automatic control

## Corporate Profile

Multi-Link, Inc. is a Kentucky based manufacturer dedicated to the development and marketing of high quality telecommunications devices for a wide variety of commercial and government applications. During our 16 years of operation, we have earned a reputation as a manufacturing leader and supplier of cost saving telecom solutions. Hundreds of companies, from SOHO to Fortune 500, domestic and international have installed thousands of our devices to reduce their monthly phone bills and associated costs. Our product quality and technical support is unsurpassed. Our dominant market share is attributable to universal product benefits, sound business fundamentals, and innovative product designs that keep pace with emerging technologies in a dynamic marketplace.

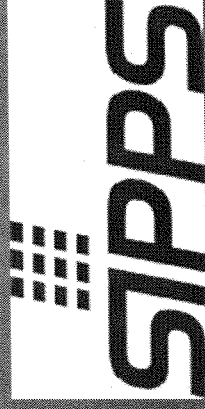
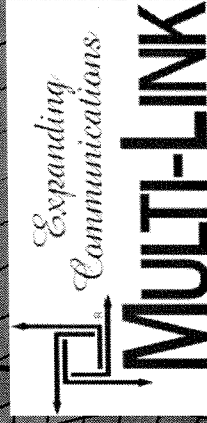
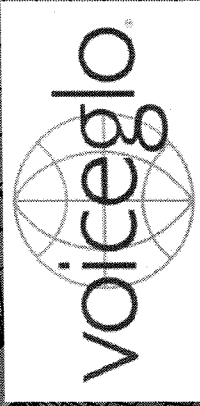
Contact us @ 800.535.4651  
[www.TELEVOIPSTICK.COM](http://www.TELEVOIPSTICK.COM)

Multi-Link, Incorporated

Bringing

VoIP

Home



**eye P Media**

# TeleVoIP Stick™ Enables

- ◆ The TeleVoIP Stick™ was designed and engineered to enable the transparent blending of the everyday phone experience with an Internet voice application.

Patent Pending

# TeleVoIP Stick™ Empowerment

- ◆ The TeleVoIP Stick™ empowers the user with new levels of convenience, choice, and control in everyday communications.

Patent Pending

# TeleVoIP Stick™ is Transparent

- ◆ Bring transparent Web voice access to all your standard home (analog) phones.
- ◆ No need to purchase ancillary VoIP handsets, microphones, speakers, or adaptors.

Patent Pending

# No More Barriers to the Residential VoIP Market

## Barrier

- ◆ E911
- ◆ Outbound Calls Restricted to a VoIP Phone
- ◆ Power outages to the PC Prevents outbound calls
- ◆ Telephone Ringing Power insufficient for Residential use.

## Solution

TeleVoIP Stick

TeleVoIP Stick

TeleVoIP Stick

TeleVoIP Stick

# Emergency 911

- ◆ The TeleVoIP Stick will automatically route 911 calls to your traditional phone (POTS) service!
- ◆ Power outages to the PC will not hamper emergency phone calls. The TeleVoIP Stick defaults to the POTS line.

Patent Pending

# Use Any Phone

- ◆ The TeleVoIP Stick™ enables ALL home phones to operate as traditional analog phones OR as VoIP phones...transparently!
- ◆ Calling habits remain the same.

Patent Pending

# Power Outages

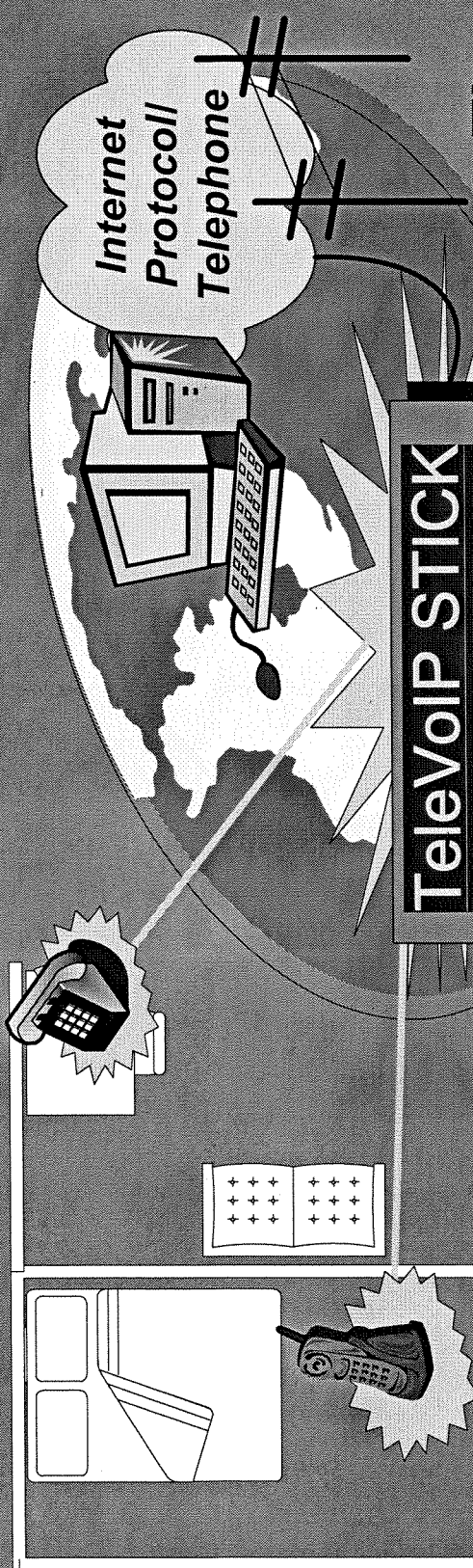
- ◆ The TeleVoIP Stick™ automatically directs ALL outbound calls to the POTS line during power failures.
- ◆ Does not rely on a UPS for back up power.

Patent Pending

# Ring ALL Phones

- ◆ The TeleVoIP Stick™ was designed to provide enough power to ring multiple home phones.
- ◆ REN 5.0 49.5 Volts RMS AC

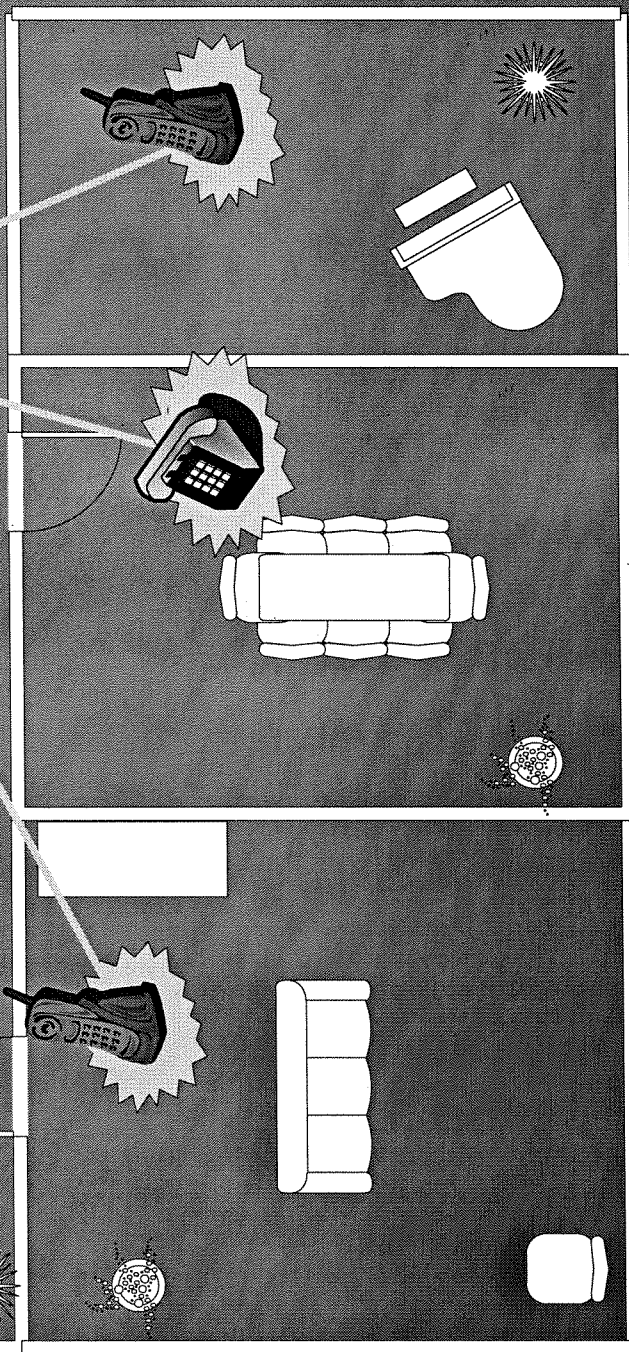
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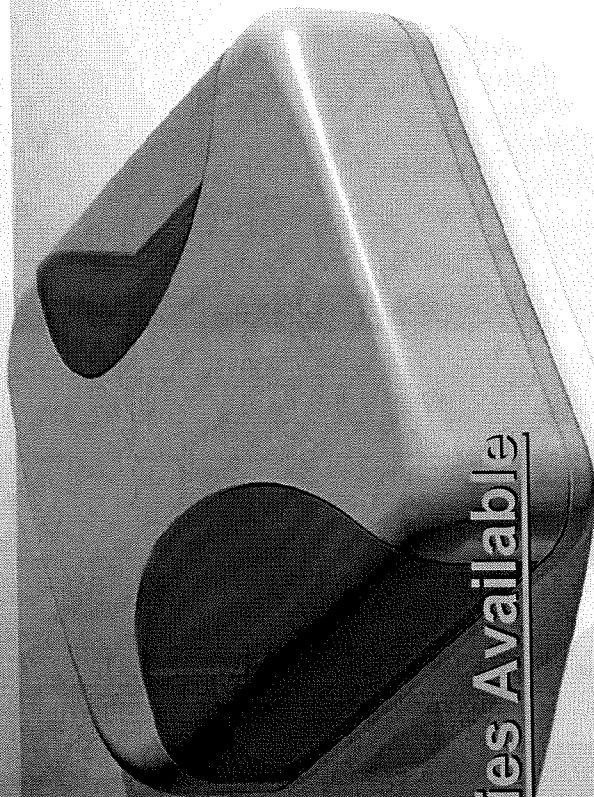
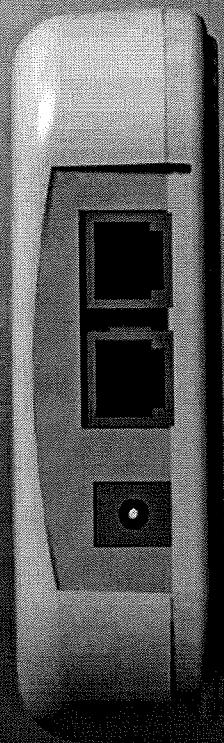
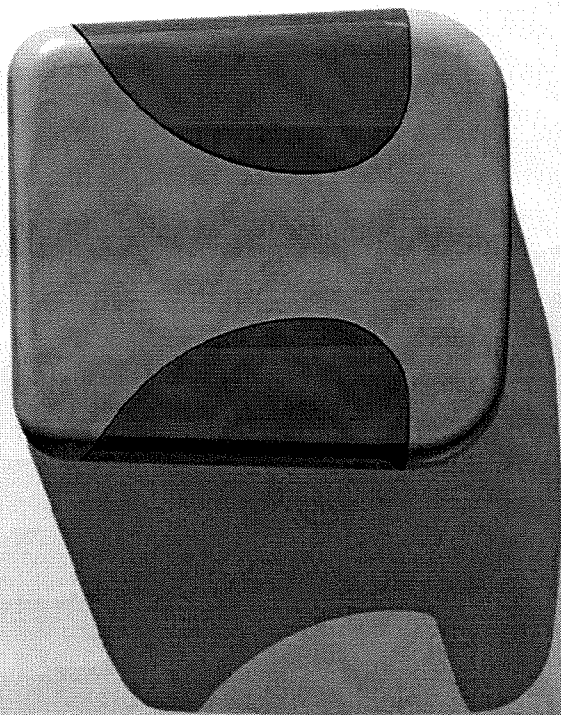


# The TeleVoIP STICK®

enables  
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By Multi-Link,  
Manufacturing  
Excellence for 16  
Years





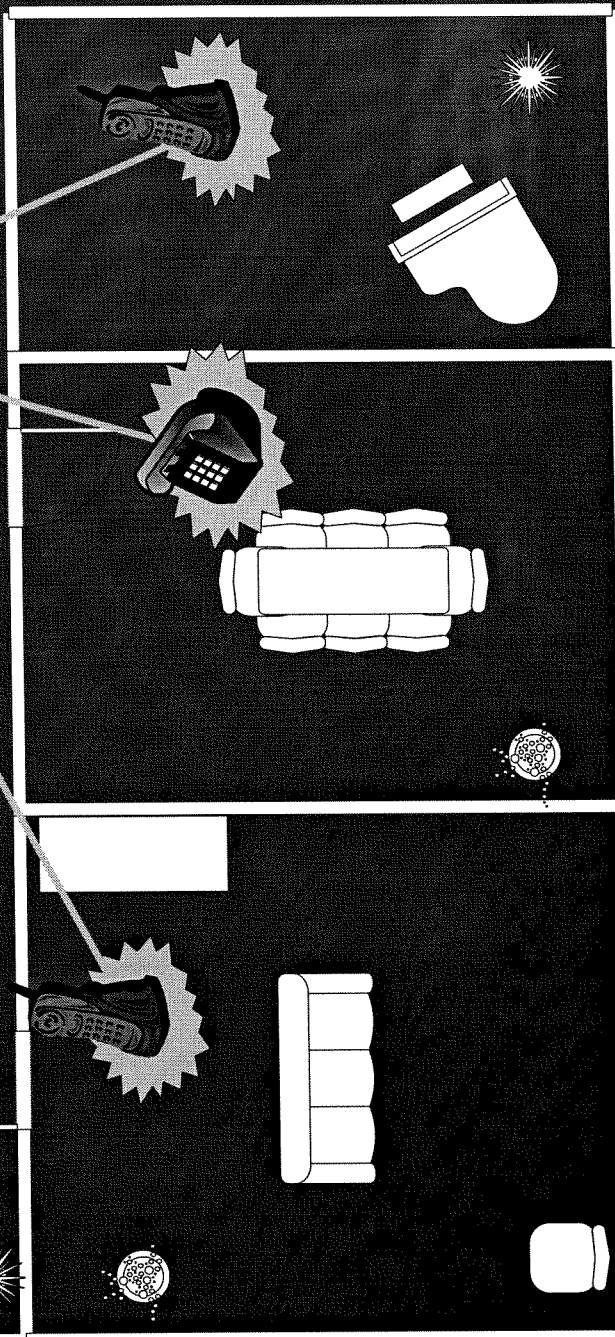
OEM Opportunities Available



# The TeleVoIP STICK®

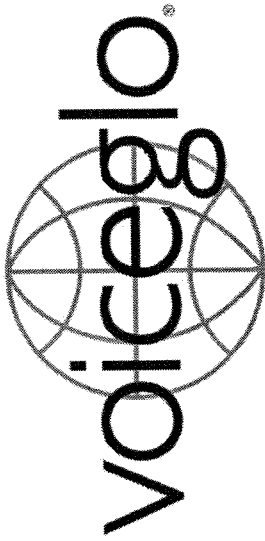
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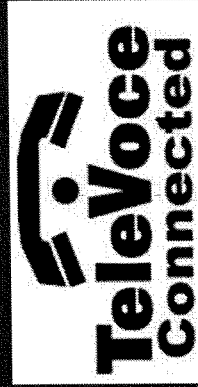


# Corporate Profile

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**eye P Media**



glophone . . . . . turn your pc into a phone.



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**EX PARTE**

May 3, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: IP-Enabled Services, WT Docket 04-36**

Dear Ms. Dortch:

Multi-Link Incorporated ("Multi-Link"), by and through its counsel, hereby submits these informal comments in the above-captioned proceeding. In the *IP-Enabled Services Notice of Proposed Rulemaking*, the Commission sought comment as to whether VoIP services are technologically and operationally capable of providing 9-1-1 and E-9-1-1 service, and whether it would be appropriate to require that some or all IP-enabled voice services provide 9-1-1 functionality to consumers. *See IP-Enabled Services*, 19 FCC Rcd 4863, at ¶¶ 51-58 (2004). Multi-Link submits these comments to provide information regarding its new, proprietary VoIP solution, the TeleVoIP Stick. The TeleVoIP stick can be used to provide E-9-1-1 call from any VoIP phone over existing phone lines.

Multi-Link is dedicated to the development and marketing of high quality telecommunications and telephony devices for a variety of commercial, small office, and home applications. Hundreds of companies have reduced their monthly phone bills and associated costs by using Multi-Link products. Multi-Link has continued to build its reputation as a manufacturing leader by introducing an exciting array of Voice over Internet Protocol ("VoIP") solutions for both business and residential use.

Recently, Multi-Link unveiled the TeleVoIP Stick. Simply put, the TeleVoIP Stick is a revolutionary residential VoIP communication system that allows users to access VoIP technology using their existing analog telephone equipment. The TeleVoIP Stick seamlessly integrates VoIP service with the existing Public Switched Telephone Network ("PSTN"), in a manner that is wholly-transparent to consumers. During power failures or broadband service disruptions, the TeleVoIP Stick automatically directs all outbound calls to the PSTN line, allowing for seamless communication service.

Ms. Marlene H. Dortch  
May 3, 2005  
Page 2

One of the most critical features of the TeleVoIP Stick is its ability to automatically route 9-1-1 calls through the traditional PSTN line. This unique patent-pending feature allows consumers to reap the benefits of VoIP service, while simultaneously ensuring that they can easily access 9-1-1 service through their PSTN lines. Thus, the TeleVoIP Stick eliminates any concern that users of any underlying VoIP service would be unable to obtain emergency service.

Accordingly, Multi-Link respectfully requests that the Commission specify that where VoIP service is provided to a residence using equipment designed to automatically route all 9-1-1 calls through an existing PSTN connection – such as the TeleVoIP Stick – that would satisfy any 9-1-1 or E-9-1-1 requirement that may be imposed on fixed users of VoIP services. In this manner, the Commission would safeguard the public while ensuring that qualifying VoIP providers are able to offer innovative, competitive services without additional regulatory burdens.

In addition, Multi-Link respectfully requests that the Commission require local exchange carriers to maintain “soft dial tone” service, sufficient to enable an end user to access 9-1-1 services, over all existing but otherwise disconnected PSTN lines. “Soft dial tone” service would enable customers who select a VoIP solution to access critical emergency services without the need to purchase a redundant local service. Consequently, the availability of “soft dial tone” service would facilitate competition and benefit consumers with lower prices and better service. Moreover, by leveraging existing PSTN connections to provide 9-1-1 and E-9-1-1 service, the Commission would reduce – or even eliminate – the need for government agencies, VoIP service providers and emergency responders to expend hundred of millions of dollars in order to adapt to new VoIP services.<sup>1</sup>

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<sup>1</sup> At least three states – California, New York, and Vermont – already impose a “soft dial tone” requirement on local exchange carriers. See Cal. Code, Public Utilities, § 2883; 16 NYCRR §603.5(d); Vermont Public Service Board R. 7.102.

Ms. Marlene H. Dortch  
May 3, 2005  
Page 3

Please contact the undersigned should you have any questions in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn S. Richards". The signature is fluid and cursive, with a large initial "G" and "S".

Glenn S. Richards  
*Counsel for Multi-Link, Incorporated*

# Japan leads in net-based telephony

Tokyo

May 2, 2005 - 9:33AM

Eighty per cent of the world's internet-based voice telephone users are in Japan, which should come as no surprise given the steep cost of traditional fixed-line phone calls.

The proliferation of Voice over internet telephony, or VoIP, also owes its success in this archipelago nation to the aggressive push of one company, Softbank Corp, which cleverly handed out free modems on the streets to promote broadband.

Softbank, which also owns a major stake in the Yahoo portal in Japan, made internet telephony a central component in its now three-year-old Yahoo BB broadband service package.

Although rival telecoms have also begun offering internet voice services, pioneer BB Phone dominates the market with more than 4.5 million subscribers.

The main attraction for the service is that calls between BB Phones are free. And that's helping put downward pressure on fixed line costs.

International calls come especially cheap with BB Phone at ¥2.5 (2 US cents) per minute for calls to the United States. Calls to the United States with the dominant traditional phone company in Japan, NTT, can cost as much as ¥60 (56 US cents) for the first minute.

The Yahoo! broadband package ranges in monthly price from about ¥3000 (\$A35) to about ¥4000 (\$A50), and that includes the BB Phone.

No new phone is required. All you have to do is connect your phone through the jack to the modem. Adding to the attraction is that people can keep using their old phone numbers.

Net-based phones don't connect to emergency calls to the police and fire department, but BB Phone will automatically switch to NTT for such calls.

BB Phone users aren't allowed to disconnect their NTT service and must pay the basic ¥Y1700 (\$A20) NTT fee.

AP